## IN THE DISTRICT COURT OF THE UNITED STATES OKLAHOMA EASTERN DISTRICT

GREAT LAKES INSURANCE SE,	)	
Plaintiff,	) Case No.:	CIV-23-52-JAR
vs.	)	
	)	6:23-CV-00052-JAR
WAGNER & LYNCH, PLLC,	)	
	) Hon. Jason	A. Robertson
Defendant.	)	
	)	

## **DEFENDANT'S PRELIMINARY EXHIBIT LIST**

COMES NOW the Defendant, Wagner & Lynch, P.L.L.C., by and through their attorney of record Wesley J. Cherry, and submits the following preliminary exhibit list pursuant to the Court's Scheduling Order to exchange the same.

No.	Exhibit	Objection	Ruling
1	All photographs, videos, or diagrams regarding this case.		
2	Responses to Discovery		
3	Electronic Mail from Defendant		
4	Electronic Mail from Plaintiff		
5	Claim file of Plaintiff including subject policy documents and declarations.		

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6	Invoices from FloodServ	
7	Invoices from Baytown Construction	
8	Invoices from Superior Plumbing	
9	Pleadings in prior suit of Defendant versus Plaintiff	
10	Exhibits to depositions, if applicable.	
11	Transcript to Depositions, if applicable.	
12	All exhibits relied on by witnesses.	
13	All exhibits listed by Defendant not objected to by Plaintiff.	
14	All exhibits obtained by Defendant <i>via</i> discovery.	
15	All exhibits obtained by Plaintiff <i>via</i> discovery and not objected to by Defendant.	

16	All demonstrative exhibits relied upon by expert witness(es).	
17	Corporate / financial records of Plaintiff.	
18	Claims-handling procedures of Plaintiff.	
19	Any exhibits produced by Defendant pursuant to ongoing discovery.	
20	Any exhibits produced by Plaintiff pursuant to ongoing discovery not objected to by Plaintiff	

As discovery is ongoing, Defendant reserves the right to supplement this list.

DATED this 5th day of May, 2023.

Respectfully submitted by:

Wesley J. Cherry, OBA #22851 FOUNDATION LAW, P.L.L.C.

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Attorney for Defendant-Counterclaimant

## **CERTIFICATE OF SERFVICE**

I CERTIFY that on this 5th day of May, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notifications to the following:

Michael Linscott, OBA #17266
Alexandra Gage, OBA #33874
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Attorneys for Plaintiff

I CERTIFY that on this 5th day of May, 2023, I sent the foregoing to the following individuals without the use of the CM/ECF system, via U.S. Mail, all postage pre-paid:

NONE.